

Washington State Association of Counties

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Megan White Program Manager, Water Quality Program WA State Department of Ecology PO Box 47600 Olympia, WA 98504-7600

Jerry Alb Director, Environmental Services WA State Dept of Transportation PO Box 47331 Olympia, WA 98504-7331

Dear Megan White and Jerry Alb:

The completion of the Washington Stormwater Management Study has been a long and challenging task. The Washington State Association of Counties (WSAC) would like to commend all those individuals who participated in this task and to recognize the significant effort that went into the final report.

A number of WSAC member Counties participated in the development, review, and finalization of both the December 2000 Washington Stormwater Management Study Interim Report to the Legislature as well as the final report. We generally believe that these work products are a fair representation of the discussions and conclusions.

If we have a concern over the final report it is that it may appear to the casual reader the issues raised pertaining to stormwater management are well defined, well understood, and, therefore, relatively easy to resolve. On the contrary, a more deliberate reading of the report should lead one to the conclusion that the scientific and regulatory matters involved are very complex and include significant overlapping relationships with most all other water resource management challenges facing this state and most of the country.

It needs to be emphasized that stormwater management issues are not simply matters relating to future land development decisions. The regulatory mandates currently in place and those that are being proposed potentially affect every individual in this state. This includes long-standing communities and neighborhoods. The reality of the differences

between urban/rural and wet/dry, together with economic health and other unique local conditions, make reasonable and equitable response very difficult.

Within these complexities of stormwater management issues, we suggest that the more than 40 recommendations contained in the final report not be considered as independent matters. Rather, there must be time spent to understand their interrelationship and seek solutions that are generally understood by those affected and that can actually be accomplished. It serves no beneficial purpose to design solutions that simply assign fault, which will assure failure.

Regardless of your position as to who may ultimately be responsible, it is very clear that there is a significant gap between current available stormwater management resources and regulatory expectations. In addition, it seems very clear that it will be beneficial to develop an ongoing and deliberate communication and coordination effort, similar to that accomplished through the Stormwater Policy Advisory Committee. Any ongoing effort in this regard should be designed to assure that there is a sense of balance and reality between technical, regulatory and operational goals and the development of practical solutions.

Counties will continue to seek opportunities to cooperatively develop practical solutions between federal, state, and local interests, and between regulatory agencies and affected individuals. We look forward to discussing these issues with you more fully and hope that you will join us in working for reasoned legislative support for successful actions to address these issues.

Sincerely,

Paul Parker Assistant Executive Director